

Tri-State Motor Transit CO.(TSMT)is pleased to submit comments in response to the FHWA-2002-11819 regarding Dromedary Equipment.

TSMT has transported Arms, Ammunition, and Explosives (AA&E) for the U.S. Department of Defense (DOD) since 1935.

TSMT has been using Dromedary equipment (DROM) to transport AA&E for the DOD since 1968.

TSMT beleives that the most efficient way to transport non-compatible explosives to the end user (troops in the field) is through the utilization of the Dromedary system.

The use of the Dromedary system allows for only one vehicle to transport the non-compatible explosives. Therefore, reduces the number of vehicles (Tractor/Trailors) on the nations highways.

Due to the present State Regulations TSMT has been confronted with paying penalties for being overlength in several states. This situation exposes a carrier to being put Out Of Service while transporting classified, sensitive freight by state enforcement. Therefore, increasing exposure to terrorist activities.

Reason--The Dromedary box carried behind a tractor changes the legal definition from a tractor/semi-trailer operation to a Straight Truck trailer operation; and in many states this constitutes an overlength situation.

With the revision to 23 CFR Part 658.5 and 658.13 allowing a Dromedary equipped tractor/semi-trailer unit up to seventy-five (75) feet overall lenght will increase our military readiness as well as reduceing the number of vehicles on the nations highways.

TSMT acknowledges the Military Traffic Management Command (MTMC)for taking this issue to task and appreciates there efforts.

TSMT is a proponant of Security, Safety, and Compliance and looks at this revision as a step in that direction.

Respectfully Submitted,

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Director/Compliance